

JONATHAN HOWDEN, CA BAR NO. 97022
THELEN REID BROWN RAYSMAN & STEINER LLP
101 Second Street, Suite 1800
San Francisco, CA 94105
Tel: 415.371.1200
Fax: 415.371.1211

Attorneys for Material Witness
LIANG XIAN ZHENG

United States District Court
Northern District of California

In Re Material Witness Warrant

Case No.: 07 90552 MISC VRW (JCS)

APPLICATION FOR TRAVEL ORDER

Material witness Liang Xian Zheng, by and through his counsel, Jonathan Howden, hereby applies to the Court for an order permitting him to travel outside of the Northern District Of California. In support of this application, counsel proffers the following:

1. Mr. Wang¹ is a former classmate and close friend of Material Witness Liang Xian Zheng (hereinafter Mr. Zheng).
2. Mr. Wang and his family live in the Central District of California, where they operate their own restaurant.
3. Mr. Zheng spent several weeks with Mr. Wang and his family in January and February of 2008.
4. Mr. Zheng would like to spend approximately seven weeks visiting Mr. Wang and his family through the end of May, 2008.

¹ Mr. Wang's full name has been provided to the government. It is not used here in order to preserve his privacy.

1 5. Mr. Zheng proposes to travel by bus to the Central District of California and
2 to reside with the Wang family at their residence.

3 6. Counsel for Mr. Zheng will provide to AUSA Geis the address and
4 telephone number of Mr. Wang and his family before as soon as the Court enters an
5 order permitting Mr. Liang to visit Mr. Wang.

6 7. Mr. Zheng will depart from San Francisco to visit his friend no sooner than
7 April 9, 2008, and return to San Francisco no later than May 31, 2008. During that time,
8 he will not travel anywhere other than the Northern and Central Districts of California.

9 8. Mr. Zheng will call or leave a message every other day on a telephone
10 agreed upon by counsel for Mr. Zheng and the United States.

11 9. If requested by the Office of the United States Attorney, Mr. Zheng will
12 return from his visit to Mr. Wang before May 31, 2008 in order to testify in such
13 proceedings as the prosecutor may require. However, in that event, the Office of the
14 United States Attorney will pay for Mr. Zheng's transportation to and from the Central
15 District of California.

16 10. I have informed AUSA Geis of this proposed travel and she does not object.


17 Wherefore, undersigned counsel on behalf of Mr. Zheng requests that this Court
18 enter the aforementioned order.

19 Respectfully submitted.

20 Dated: April 10, 2008

21 THELEN REID BROWN RAYSMAN & STEINER LLP

22
23 By

24 
25 Jonathan Howden, CA Bar No. 97022
26 Attorney for Material Witness
27 Liang Xian Zheng
28